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#### BY POST & EMAIL

Dear Sir

#### Haringey Community Infrastructure Levy Draft Charging Schedule Minor Modifications Consultation Representations on behalf of Tottenham Hotspur Football Club

These representations are made specifically in response to the Council's consultation on the modifications to the Draft Charging Schedule, which was submitted to the Planning Inspectorate on 28<sup>th</sup> October 2013 for examination. They should, however, be read in conjunction with the representations on the Draft Charging Schedule we submitted on behalf of the Club in June, which set the context for the Club's interest in the Haringey CIL.

We are scheduled to appear on behalf of the Club at the Examination on 18<sup>th</sup> December in relation to Issue 2 (Residential Levy Rates), which we intend to confirm in due course.

#### All Other Uses Rate

The Club welcomes the reduction of the "All Other Uses Rate" from £50/m<sup>2</sup> to nil. Although the Mayoral CIL at a rate of £35/m<sup>2</sup> will still apply, it will reduce the overall CIL burden on the wide range of non-residential, non-retail uses that will be essential in the delivery of the Council's regeneration aspirations across the High Road West Masterplan area and the wider Northumberland Park Area of Change. This will be important in the overall viability and deliverability of the Council's development plan objectives.

#### Regulation 123 List

Regulation 123(4)(a) defines "relevant infrastructure" as:

*"...a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL..."*

The definition therefore implies that the list may not necessarily be exhaustive.

The Draft Regulation 123 List contained within the Draft Charging Schedule consulted upon during June set out a widely expressed range of infrastructure that was non-project specific, e.g. "state funded education facilities" and "public open space improvements, leisure facilities". The approach would therefore have enabled the Council to spend some of the CIL receipts it would collect on the "relevant infrastructure" supporting the High Road West Masterplan and the Northumberland Park AAP.

The Club is therefore surprised to note that the Regulation 123 List set out in the submission version of the Draft Charging Schedule is far more narrowly drawn and now only lists seven specific infrastructure projects. Furthermore, the list does not appear to contain any provision for relevant infrastructure in relation to either



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High Road West or the Northumberland Park AAP: the implication being that it will be funded through S.106 planning obligations. However, the cost of delivering the relevant infrastructure associated with the High Road West Masterplan or the Northumberland Park AAP will be substantially higher than the S.106 costs assumed in the Charging Schedule evidence base. The potential impact on the viability of this regeneration is of concern to the Club.

Although the list may not necessarily be exhaustive, the Club would therefore expect the list to be more widely drawn to reflect the contents of the Council's updated Infrastructure Delivery Plan of April 2013 and the regeneration of North Tottenham, which is one of the Council's most important stated strategic priorities. The Club therefore requests that the version of the Regulation 123 list contained within the consultation version of the Draft Charging Schedule is reinstated.

The Club wishes to make this point now as the content of the Council's proposed Regulation 123 list of relevant infrastructure will not be a matter before the Inspector at the Examination.

Yours faithfully

A handwritten signature in black ink, appearing to read "Richard Serra".

**Richard Serra MRICS MRTPI**  
Director